

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:)
)
TIMOTHY GERARD BOWE,) Case Number: **20-40906-659**
)
Debtor.) Chapter 13
)
) **Motion for Relief to Negotiate**
) **Loan Modification**
) Filed by Debtor
)
) Bryan T. Voss / 48029MO
) Westbrook Law Group LLC
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**MOTION FOR RELIEF FROM AUTOMATIC STAY TO NEGOTIATE MORTGAGE
LOAN MODIFICATION**

The Debtor(s), Timothy Gerard Bowe files this Motion for Relief from Automatic Stay to Negotiate Mortgage Loan Modification (the “Motion”), and in support thereof, would show the Court the following.

1. The Court has jurisdiction of this Motion pursuant to 28 U.S.C. §§ 157(a) and 1334(a) and Local Rule 9.01(B)(1) of the United States District Court for the Eastern District of Missouri. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(G).
2. The Debtor seeks to conduct negotiations with the Debtor’s current mortgage lender, U.S. Bank Trust National Association, as Trustee of BKPL-EG Holding Trust (the “Lender”), in an attempt to reach agreement on a modification of the loan secured by the Debtors’ residential real estate located at 8944 Big Bend Blvd, Webster Groves, MO 63119 (the “Loan”).

3. The Debtor requests that the automatic stay of 11 U.S.C. §362(a) (the "Automatic Stay") be lifted for the limited purpose of allowing Loan modification negotiations with the Lender to take place.

4. Should the Debtor and the Lender reach an agreement on a Loan modification the Debtor will seek further relief from the Automatic Stay so that the Debtor and the Lender may enter into the Loan modification. Such relief will be requested on no less than 14 days notice to the Chapter 13 Trustee.

WHEREFORE, premises considered, the Debtor requests that the Court grant the relief requested in this Motion and any other such relief to which the Debtor may be entitled.

Respectfully submitted,
WESTBROOK LAW GROUP LLC

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on June 8, 2022 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

/s/ Bryan T. Voss
Bryan T. Voss